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5 *dba Golden Nugget Las Vegas Hotel*  
5 *and Casino*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 TIMOTHY DICKENS,

9 Plaintiff,

10 vs.

11 GNLV LLC, doing business as GOLDEN  
12 NUGGET LAS VEGAS HOTEL AND  
12 CASINO,

13 Defendant.

Case No. 2:21-cv-00087-APG-VCF

14 **STIPULATION AND ORDER TO  
EXTEND DEFENDANT'S DEADLINE TO  
FILE ITS REPLY IN SUPPORT OF ITS  
MOTION FOR SUMMARY JUDGMENT  
(FIRST REQUEST)**

15 Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, all parties hereby stipulate to extend the  
16 time for Defendant to file its Reply in Support of Its Motion for Summary Judgment (the “Reply”).  
17 This is the parties’ first request specifically to extend this deadline.<sup>1</sup> Defendant’s current deadline  
18 is August 11, 2023. This request is sought in good faith and not for purposes of undue delay.

19 This extension is necessary because Defendant’s in-house employee responsible for  
20 managing this litigation is out of the country for two weeks. And, on the subsequent third week,  
21 Defense counsel, who is solely responsible for this case, will be on a pre-planned family vacation.  
22 Therefore, Defendant needs additional time to prepare and finalize its Reply.

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27 <sup>1</sup> The parties have made previous requests to extend the dispositive motion deadlines as set forth in the May  
28 5, 2021 Order; however, in the past, the extensions were based either on the fact that the parties had to extend the  
discovery deadline or at Plaintiff’s request to extend the deadline for him to file his Response. ECF Nos. 15, 35, 43,  
45, 47, 49, and 51. This is only the first request by Defendant specifically to extend its Reply deadline.

1       Therefore, Plaintiff's counsel has agreed and the parties hereby stipulate that Defendant  
2 shall have up to and including September 11 2023, to file its Reply.

3       Dated this 9th day of August, 2023.

4  
5 MULLINS & TRENCHAK, ATTORNEYS  
6 AT LAW.

7       \_\_\_\_\_  
8       /s/ *Philip J. Trenchak*  
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12      *Attorney for Plaintiff Timothy Dickens*

13      JACKSON LEWIS P.C.

14       \_\_\_\_\_  
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18 Las Vegas, Nevada 89101

19      *Attorneys for Defendant*  
20 *GNLV Corp dba Golden Nugget Las Vegas*

21                   **ORDER**

22                   IT IS SO ORDERED.



23                   ANDREW P. GORDON  
24                   UNITED STATES DISTRICT JUDGE

25                   Dated: August 11, 2023